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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

John Pegnam,

Case No.: 2:21-cv-01867-GMN-VCF

Plaintiff,

V.

Lac du Flambeau Band of Lake Superior Chippewa Indians dba Niizhwaaswi, LLC dba Loan at Last.

**Unopposed Motion for Extension of
Time for Defendant to File a
Responsive Pleading to Plaintiff's
First Amended Complaint**

Defendant.

1 John Pegnam (“Plaintiff”), by and through counsel, hereby files his
2 Unopposed Motion for Extension of Time For Defendant to File a Responsive
3 Pleading to Plaintiff’s First Amended Complaint, and requests an order
4 extending the deadline for Defendant to file a responsive pleading to
5 Plaintiff’s First Amended Complaint by thirty (30) days, from the current
6 deadline of April 15 , 2022 to **May 15, 2022**. This motion is submitted in
7 compliance with LR IA 6-1 and LR IA 6-2.

8 Good cause exists for the requested extension because the parties are
9 actively engaged in settlement negotiations and hope to avoid the additional
10 expense of preparing responsive pleadings, as without this added cost, the
11 parties are in a better position to reach a resolution.

12 The parties agree that an extension of Defendant’s time to answer the
13 complaint furthers the interests of this litigation. Accordingly, Plaintiff does
14 not oppose the requested extension and the extension is not being requested in
15 bad faith or to delay these proceedings unnecessarily.

16 This is the second request for an extension of Defendant’s responsive
17 pleading deadline.

18 For the foregoing reasons, Plaintiff requests that the Court issue an
19 order extending the date, to **May 15, 2022**, on which Defendant must answer or
20 otherwise respond to Plaintiff’s Complaint.

21 Dated: April 13, 2022.

22 **FREEDOM LAW FIRM**

24 /s/ Gerardo Avalos

25 Gerardo Avalos, Esq.
26 8985 S. Eastern Ave., Suite 350
27 Las Vegas, NV 89123

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

4-14-2022
DATED: _____